

**Benzotriazoles Coalition**

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December 31, 2001

Christine Todd Whitman, Administrator  
U.S. Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116

Attn: Chemical Right-to-Know Program; HPV Reference Number: [REDACTED]

Dear Administrator Whitman:

The Benzotriazoles Coalition was formed under the management of SOCMA's Association Management Center to volunteer as a sponsor in the HPV Challenge. For 2001, the Coalition committed to gathering existing data and making it publicly available, identifying potential data needs and preparing a test plan to reflect those findings. The Coalition has fulfilled this portion of the commitment and is including those materials in this package.

As you will note, the Coalition's test plan has identified the need for a developmental toxicity test for one of the materials, which can then be used as a surrogate for the others. The Coalition would like to carry out the work proposed in the test plan, but assistance will be needed by the Agency to achieve these objectives.

According to Department of Commerce statistics, in the past year the benzotriazoles markets have experienced extraordinary competition from overseas, China in particular. Prices for tolyltriazole dropped by approximately ten percent from 2000 to 2001. Prices for benzotriazole have dropped as well. Imports have more than doubled in that same period. In fact, China has 60 percent of worldwide production capacity for benzotriazoles. If the Coalition continues with its test plan, the member companies will be placed at a further competitive disadvantage in the marketplace.

The Coalition has repeatedly approached importers and requested that they join our efforts, but they have expressed no intent of doing so. After much consideration, the Coalition has reasoned that the most fair, practical way to move forward and fulfill its entire commitment under the HPV Challenge, is through regulatory action, such as a rulemaking under TSCA Section 4.

The Benzotriazoles Coalition supports EPA's efforts to work with industry under voluntary agreements to provide important health and environmental information to the public. The Coalition especially supports the HPV Challenge and is serious about fulfilling its commitment. As you can see in the test plan and robust summaries, a great deal of work has already been done in this regard. With the Agency's assistance, by including the benzotriazoles category in a rule-making, our commitment can be fulfilled, while maintaining fairness and equity among all players in the marketplace. If you or your staff have any questions, please feel free to contact me.

Sincerely,  
James Cooper  
Executive Director